

Richard A. Wright, Esq.
Nevada Bar No. 886
Wright Marsh & Levy
300 S. Fourth Street, Suite 701
Las Vegas, NV 89101
Phone: (702) 382-4004
Fax: (702) 382-4800
rick@wmllawlv.com

Attorney for Defendant David Adams

United States District Court
District of Nevada

United States of America,

Plaintiff,

v.

David Adams,

Defendant.

Case No. 2:23-cr-00054-RFB-EJY-2

Unopposed Motion for Early Termination
of Pretrial Diversion and for dismissal of
indictment¹

And Proposed Order

Memorandum of Points and Authorities

David Adams, by and through his counsel of record, Richard A. Wright, Esq. of Wright Marsh & Levy, hereby files this unopposed motion for early termination of pretrial diversion and dismissal of indictment. Sunethra Muralidhara, Esq. is associated CJA counsel on this matter and she has communicated with AUSA Melanee Smith who does not oppose early termination. She has also communicated with USPT Officer Emily McKillip who reports that Mr. Adams has “remained in compliance, reports as instructed, and there are no issues or

¹ Certification: this motion is timely filed. There are no rules governing the timing of filing this motion.

1 concerns to note.” Officer McKillip also does not oppose early termination. Given this, Mr.
2 Adams, through counsel moves for early termination of his pretrial diversion.

3 Mr. Adams was charged in a criminal indictment filed on or about March 15, 2023, in
4 the United States District Court of Nevada with three counts of conspiracy to distribute a
5 controlled substance in violation of Title 21, U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 846; one
6 count of conspiracy to distribute a controlled substance in violation of Title 21 U.S.C. §§
7 841(a)(1), 841(b)(2), and 846; four counts of distribution of a controlled substance in violation
8 of Title 21, U.S.C. §§ 841(a)(1) and 841(b)(1)(C); two counts of distribution of a controlled
9 substance in violation of Title 21, U.S.C. §§ 841(a)(1) and 841(b)(2); and one count of
10 conspiracy to money launder in violation of Title 18, U.S.C. § 1956(h). ECF 17. At the initial
11 arraignment and plea held on April 7, 2023, Mr. Adams was released on a PR Bond with
12 conditions. ECF 33, 38. After review of discovery and discussion with the USAO, the parties
13 entered into a Pretrial Diversion agreement and submitted said agreement to the Court. The
14 Court held a Pretrial Diversion hearing on or about April 30, 2024 and accepted the terms of
15 the agreement. ECF 65.

16 This pretrial diversion agreement includes as a provision that Mr. Adams shall be on
17 pretrial diversion under certain stated conditions for a “period up to 18 months.” *See PT*
18 *Diversion Agreement* at 2:9. Additionally, the agreement allows for the United States Attorneys
19 Office to release Mr. Adams from supervision at any time. *Id.* At 2:12-13. Pursuant to the
20 Pretrial Diversion Agreement, once Mr. Adams successfully completes the Pretrial Diversion
21 Program, the Government will not prosecute him for any stated offenses and agrees that all
22 charges against Mr. Adams will be dismissed. Moving for early termination under this
23 agreement is acceptable given the terms the parties agreed to.

24 Mr. Adams has been participating in the Pretrial Diversion Program since April 30,
25 2024. He has successfully completed one year and now moves for early termination of pretrial
26 diversion and for dismissal of the indictment against him. He has stable employment and

1 housing. He has been doing well restructuring his life since these events transpired. He has
2 stayed out of trouble and is committed to living a law-abiding life.

3 Given there is no opposition to this request, he requests this Court grant this motion and
4 dismiss the indictment against him.

5
6 DATED May 15, 2025.

7 Wright Marsh & Levy

8
9 By: /s/ Richard A. Wright

10 Richard A. Wright
11 Attorney for David Adams
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

United States District Court
District of Nevada

United States of America,

Plaintiff,

v.

David Adams,

Defendant.

Case No. 2:23-cr-00054-RFB-EJY-2

ORDER

Based on the unopposed motion and for good cause appearing, IT IS ORDERED that this unopposed motion for early termination of pretrial diversion be GRANTED. Mr. David Adams is hereby released from any and all conditions he was once under pursuant to the pretrial diversion agreement. The Government may now file their Motion to Dismiss the Indictment against Mr David Adams.

DATED this the 27th of May, 2025.



Richard F. Boulware
United States District Court Judge

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of Wright Marsh & Levy and is a person of such age and discretion as to be competent to serve papers. That on May 15, 2025 she served the above-entitled document either via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list, emailed, hand delivered, facsimile, or placed in the United States mail, postage prepaid, to the following persons at their last known address:

Sigal Chattah
United States Attorney District of Nevada
Melanee Smith
Assistant United States Attorney
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101

/s/ Debbie Caroselli
Employee Wright Marsh & Levy